

REMARKS

This amendment is in response to the Official Action mailed November 14, 2006. In the present paper, claims 1, 3, 11 and 13 are amended and claims 2 and 12 are canceled. Claims 6 and 16 were canceled in a previous paper. Claims 1, 3-5, 7-11, 13-15 and 17-27 are presented for the Examiner's consideration in view of the following remarks:

*The Present Invention*

The present application is directed to a call processing center capable of accepting calls from a plurality of disparate telecommunications networks. Specifically, agent availability information is shared among the disparate networks through an Agent Availability Network Control Point (AA NCP) that may reside in the call processing center (present spec., p. 6, lines 3-17). The AA NCP contains an I/O module that interfaces with each disparate telecommunications network (p. 6, line 18 – p.7, line 1). The AA NCP further contains modules for tracking agents and for routing calls through the disparate networks (p. 6, line 14 - p. 7, line 10).

The inventors have discovered a technique whereby agents, each within each of several disparate networks, have their availability tracked by the AANCP. The AANCP therefore tracks agent availability among multiple disparate caller networks without becoming involved in connecting calls between the caller networks and an "agent network." Instead, the agents are themselves connected to each disparate network.

The Examiner has rejected claims 1, 2, 4, 5, 7-12, 14, 15 and 17-27 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,614,783 to Sonesh et al. ("Sonesh") in view of

Applicants' alleged admitted prior art (FIG. 1), and has rejected claims 3 and 13 under 35 U.S.C. § 103(a) as unpatentable over Sonesh in view of Applicants' alleged admitted prior art and further in view of U.S. Patent No. 5,987,116 to Petrunka et al. ("Petrunka").

### ***Discussion***

Applicants respectfully assert that, for the reasons stated below, the claims as amended are not anticipated by or obvious over the cited art because the combination made by the Examiner does not yield the limitations of the claims. Specifically, all claims require that agent availability be determined or updated with respect to each of the disparate networks. In the combination made by the Examiner, agent availability cannot be determined across disparate networks, because the Examiner's combination utilizes an ACD for call distribution.

Independent claims 1 and 11 have been amended herein to include the limitations of claims 2 and 12, respectively. Those claims now require that agent availability be updated "with respect to each of the disparate telecommunications networks." Independent claim 21 requires that an agent be determined available "if an agent is not in communication with at least one of the plurality of the (disparate) telecommunications networks." Claim 22 contains a similar limitation. Claim 27 determines availability "based on an availability status in the first telecommunication network and an availability status in the second telecommunication network." All claims therefore now require that agent availability be updated with respect to disparate networks.

This discussion will initially address amended claim 1. The Examiner has cited Sonesh in combination with FIG. 1 of the present application as the primary reference in rejecting claim

1 (and claim 2, which has been incorporated therein). The Examiner alleges that the ACD 110 of Sonesh (not numbered in FIG. 1) performs the claimed functions, including determining the availability of agents in disparate telecommunications networks. The Examiner notes that Sonesh does not disclose that the agent is within a circuit switched network, and combines Sonesh with FIG. 1 of the present application, which Applicants have labeled as prior art.

FIG. 1 of the present application is a block diagram showing a plurality of disparate networks connected to an agent 5 in a call center 6. The Figure illustrates the basic problem solved by the present invention. As noted in the Present Specification, there is no way to share information between the disparate networks in FIG. 1 about the availability of an agent (Spec. at p. 3, lines 9-10). Instead, “each connection is completed to the agent regardless of whether the agent is already communicating over another network connection.” (Spec. at p. 2, line 20 – p. 3, line 2).

The combination made by the Examiner does not disclose updating an availability entry with respect to each of the disparate telecommunications networks, as required by claim 1. Sonesh discloses an ACD connected to agents in two Internet networks 112, 113 (Sonesh, FIG. 1). The two Internet networks 112, 113 of Sonesh are not “disparate” networks as defined in the present application and claimed in claim 1. The Examiner combines Sonesh with FIG. 1 of the present application, which shows an agent connected to a switched network. In discussing FIG. 1, however, the disclosure of the present application clearly explains that an ACD, such as that found in the Sonesh reference, cannot receive network information relating to disparate networks:

Within each network environment, Automatic Call Distributors (ACDs) have been used for intelligently distributing call to available agents. Nevertheless, conventional ACDs do not

have the capability to receive information relating to disparate network connections for intelligently routing a call or session to an available agent because a conventional ACD operates only within a particular environment in which the ACD is connected.

Present Specification at p. 3, lines 3-8. Sonesh uses the ACD 110 for receiving information from agents in Internet networks 112, 113 only. There is no teaching or suggestion in Sonesh to connect an agent within a disparate network such as the PSTN 111 and to update agent availability in that disparate network, as required by amended claim 1. Indeed, the prior art section of the present application, in describing the Figure cited by the Examiner, teaches against such a combination.

Even if the Internet networks 112, 113 of Sonesh, FIG. 1, were considered disparate networks, which they are not, the combination made by the Examiner still does not contain all the limitations of amended claim 1 because that claim requires that one of the disparate networks be a circuit switched network. Sonesh does not teach an agent connected to a circuit switched network, and the present application teaches that an ACD (like that in Sonesh) would not have the capability to receive information relating to such an agent.

Applicant therefore submits that amended claim 1, together with claims 3-5, 7-10 and 23, which depend from claim 1, are patentable for the above reasons. Applicants further submit that the remaining claims in the case, which all require that agent availability be updated with respect to disparate networks, and some of which also require that the disparate networks include a circuit switched network, are patentable for the same reasons.

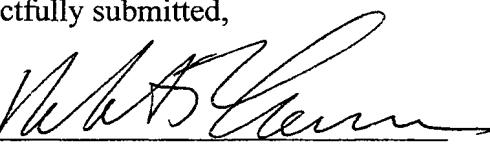
Conclusion

Applicants therefore respectfully submit that all the claims in the case are now in condition for allowance, and earnestly request that the Examiner issue a Notice of Allowance.

Should the Examiner have any questions regarding the present case, the Examiner should not hesitate in contacting the undersigned at the number provided below.

Respectfully submitted,

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